1
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Donna T. Parkinson – State Bar Number 125574
Thomas R. Phinney – State Bar Number 159435
PARKINSON PHINNEY
3600 American River Drive, Suite 145
Sacramento, CA 95864
Telephone: (916) 449-1444
Facsimile: (916) 449-1440
E-Mail: donna@parkinsonphinney.com
Attorneys for Merced DIP Lender, LLC,
a wholly owned affiliate of Legalist, Inc.

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF CALIFORNIA FRESNO DIVISON

In re	
COMPASS POINTE OFF CAMPUS	Case No. 22-10778-A-11
PARTNERSHIP B, LLC,	JOINT STATUS STATEMENT RE MOTION TO INCUR DEBT
Debtor.	DCN: NCK-5
	October 10, 2022

October 19, 2022 Time: 9:30 a.m. Courtroom: 11, 5<sup>th</sup> Floor Dept: A 2500 Tulare Street, Fresno, CA Hon. Jennifer E. Niemann

Debtor and Debtor in Possession, Compass Pointe Off Campus Partnership B, LLC ("Debtor"), Merced DIP Lender, LLC, a wholly subsidiary of Legalist, Inc. ("Merced") and Dakota Note, LLC ("Dakota") (hereafter sometimes collectively referred to as the "Parties") submit the following Joint Status Statement regarding the Debtor's Motion to Incur Debt ("Motion") (DCN NCK-5). The Court granted the Motion at the hearing on October 6, 2022 at 2:30 pm and instructed the parties to provide a proposed order.

The Parties have exchanged revisions to the proposed order and conferred by video conference and have reached a mutually agreed proposed order. A blackline version of the proposed order is filed herewith as <a href="Exhibit 1">Exhibit 1</a>. The proposed order will be uploaded pursuant to the USBC Eastern District Local Rules of Practice.

1

(Signatures on next page.)

1	Dated: October 17, 2022		Respectfully submitted,
2			DA DIZINGONI BUTTATAWAY
3			PARKINSON PHINNEY
4		By:	/s/ Donna T. Parkinson Donna T. Parkinson
5			KRISS & FEUERSTEIN, LLP Daniel N. Zinman
6 7			Daniel N. Zinman 360 Lexington Ave., Suite 1200 New York, NY 10017
8		Attor	
9		a who	neys for Merced DIP Lender, LLC, olly owned affiliate of Legalist, Inc.
10			FEAR WADDELL, PC
11			
12		Ву:	D. I. F. J.
13			Peter L. Fear, Attorneys for Dakota Note, LLC
14			THE KNIGHT LAW GROUP
15			
16		Ву: _	X.
17			Noel Knight, Attorney for Debtor, Compass Pointe Off Campus Partnership B, LLC
18			Partnership B, LLC
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
- 11			

2

1	Dated: October 17, 2022		Respectfully submitted,
2			PARKINSON PHINNEY
3			PARKINSON PHINNET
4		By:	/s/ Donna T. Parkinson Donna T. Parkinson
5			KRISS & FEUERSTEIN, LLP Daniel N. Zinman
6 7			Daniel N. Zinman 360 Lexington Ave., Suite 1200 New York, NY 10017
8		Attor a who	neys for Merced DIP Lender, LLC, olly owned affiliate of Legalist, Inc.
9			FEAR WADDELL, PC
10			
11			
12		By:_	Peter L. Fear, Attorneys for Dakota Note, LLC
13			reter L. rear, Attorneys for Dakota Note, LLC
14			THE KNIGHT LAW GROUP
15			
16		By: _	
17			Noel Knight, Attorney for Debtor, Compass Pointe Off Campus Partnership B, LLC
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

{402/00001/DTP/A0448100.DOCX}

Joint Status Statement

2